

### **REMARKS/ARGUMENTS**

In view of both the amendments presented above and the following discussion, the Applicants submit that none of the claims now pending in the application fail to comply with 35 USC § 112 first paragraph, are anticipated under the provisions of 35 USC § 102 (e) or are obvious under the provisions of 35 USC § 103 (a). Thus, the Applicants believe that all of these claims are now in allowable form.

If, however, the Examiner believes that there are any unresolved issues resulting in adverse action in any of the claims now pending in the application, Applicants respectfully request that the Examiner telephone Ms. Janet M. Skafar, Esq. at message telephone number (650) 988-0655 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

#### **Status of Claims**

Claims 1-13, 24-27, 29-32, 39-45, 48, 50, 52-58 are pending in this application. Claims 14-23, 28, 33-38, 46, 47, 49 and 51 are canceled.

#### **The Rejection of Claims 1-13, 24-27, 29-32, 39-45, 48 and 50 Under 35 USC § 112, 1st Paragraph**

Claims 1-13, 24-27, 29-32, 39-45, 48 and 50 are rejected under 35 USC § 112, first paragraph, as failing to comply with the enablement requirement.

In response, Claims 1, 2, 3, 6, 7, 8, 9 and 12; 24 and 27; 39, 41, 42, 43, 45; 48; and 50 have been amended to more particularly point out the invention.

Claims 1-13 and 48

Per MPEP section 2164, the enablement requirement refers to the requirement of 35 U.S.C. 112, first paragraph that the specification describe how to make and how to use the invention. **The invention that one skilled in the art must be enabled to make and use is that defined by the claim(s)** of the particular application.

In section 6 of the final rejection of 03/21/2008, the rejection asserts that on page 5 of applicant's specification, the components of the software system "... comprises four modules ..." that can be used to create various structures or complete tasks. None of Claims 1-13 uses the term "module."

In the rejection on page 3 of the Final Office Action of March 21, 2008, the Examiner indicates that although the specification gives examples of what the API does, it never clearly defines the API. Yet, in the Response to Arguments section on page 36 of the rejection of March 31, 2008, the Examiner admits that the Applicants have defined an API in the specification. Furthermore, even assuming that Figure 1 does not show an Application Programming Interface (API), page 3 lines 13-20 and page 5, line 19 to page 6 line 4 of Applicants' specification discloses an API. Therefore, the Applicants respectfully maintain that the API is defined.

The Examiner asserts that there are inconsistencies in the nodes exact definition. Applicants respectfully disagree. Applicants also respectfully point out that Claims 1 and 48 do not use the terms "node" or "nodes". Claims 1 and 48 recite a first link, a second link, a third link, a fourth link, a fifth link, a sixth link, a seventh link and an eighth link.

In section 6 of the final rejection of 03/21/2008, the rejection asks how all these parts or "components" of the system function together. In the response to

arguments section of the final rejection of 03/21/2008, the Examiner asserted that the claims are not clear and they do not show the interrelationship between the claimed components. In response, Claims 1 and 48 have been amended to clarify the interrelationship between various claimed elements.

Applicants respectfully maintain that support for Claims 1-13 and 48 can be found in Figure 1, page 3 lines 13-20, page 5 line 19 to page 6 line 9, and page 6 line 10 to page 8 line 13 of Applicants' specification.

For the foregoing reasons, Applicants respectfully maintain that the Claims 1 and 48 comply with the enablement requirement.

Claim 6 depends from Claim 1. Claim 6 recites: wherein said at least one virtual folder is at least one node, respectively, and the first, second, third, fourth, fifth, sixth, seventh and eighth links are also nodes thereby providing a plurality of nodes of the virtual repository, wherein the plurality of nodes are arranged in a parent-child hierarchy. Applicants respectfully maintain that the use of the terms "node", "nodes" and "plurality of nodes" in Claim 6 is enabled because a node that is a link and a node that is a virtual folder are specifically recited and support can be found on page 7 lines 1-9 of the specification. Therefore Claim 6 does not use the terms "node", "nodes" and "plurality of nodes" in an inconsistent manner.

Claim 8 uses the term "nodes" as follows: wherein the first, second, third, fourth, fifth, sixth, seventh and eighth links are nodes. Applicants respectfully maintain that the use of the term "nodes" in Claim 8 is enabled based on page 7 lines 1-9 of the specification, and that Claim 8 does not use the term "nodes" in an inconsistent manner.

Claim 9 uses the term "nodes" as follows: wherein the first, second, third, fourth, fifth, sixth, seventh and eighth links are nodes of the virtual repository.

Applicants respectfully maintain that the use of the term "nodes" in Claim 9 is enabled based on page 7 lines 1-9 of the specification, and that Claim 9 does not use the term "nodes" in an inconsistent manner.

For the foregoing reasons, Applicants respectfully maintain that Claims 1, 6, 8 and 48 comply with the enablement requirement. Claims 2-5, 7, 10-13 depend from Claim 1 and comply with the enablement requirement for the same reasons as Claim 1.

Claims 24-27, 29-32 and 50

In paragraph 6 of the final rejection of 03/21/2008, the rejection asserts that page 5 of applicant's specification, the components of the software system "... comprises four modules ..." that can be used to create various structures or complete tasks. In response, Claims 24 and 50 have been amended to delete the term "module". None of Claims 24-27, 29-32 and 50 use the term "module".

Claims 24, 27 and 50 use the terms: "nodes" and "nodes".

The rejection asserts that there are inconsistencies in the nodes exact definition, and that the examiner is not sure if the node is an actual entity/content or just a link to the content. The response to arguments section asserts that [nodes] can be broadly interpreted as links, URLs or the content to which the URLs point.

In response, Claims 24 and 50 have been amended to clarify "node" and "nodes". For example, Claim 24 recites: a first node of the plurality of nodes representing a first work item of a first queue of the first workflow system. Even assuming that the first work item itself is a type of node, what is claimed is clear - a first node of the plurality of nodes representing a first work item of a first queue of the first workflow

system. Therefore, Applicants respectfully maintain that the use of the terms "node" and "nodes" in Claims 24 and 50 consistent and clear.

In the rejection on page 3 of the Final Office Action of March 21, 2008, the Examiner indicates that although the specification gives examples of what the API does, it never clearly defines the API. Yet, in the Response to Arguments section on page 36 of the rejection of March 31, 2008, the Examiner admits that the Applicant has defined an API in the specification. Furthermore, page 4 lines 4-11, page 5 line 19 to page 6 line 4, and page 12 lines 8-12 of Applicants' specification discloses an API. Therefore, the Applicants respectfully maintain that the API is defined.

In section 6 of the final rejection of 03/21/2008, the rejection asks how all these parts or "components" of the system function together. In the response to arguments section of the final rejection of 03/21/2008, the Examiner asserted that the claims are not clear and they do not show the interrelationship between the claimed components. In response, independent Claims 24 and 50 have been amended to clarify the interrelationships of various claimed elements.

For the foregoing reasons, Applicants respectfully maintain that Claims 24 and 50 comply with the enablement requirement.

Claims 25-27 and 29-32 depend from Claim 24 and comply with the enablement requirement for the same reasons as Claim 24.

#### Claims 39-45

In section 6 of the final rejection of 03/21/2008, the rejection asserts that on page 5 of applicant's specification, the components of the software system "... comprises four modules ..." that can be used to create various structures or complete

tasks. In response, Claims 39, 42, 43 and 45 have been amended to delete the term "module." Applicants respectfully point out that Claims 39-45 do not use the term "module."

The rejection asserts that there are inconsistencies in the nodes exact definition. Applicants respectfully point out that Claims 39-45 do not use the terms "node" and "nodes".

In the rejection on page 3 of the Final Office Action of March 21, 2008, the Examiner indicates that although the specification gives examples of what the API does, it never clearly defines the API. Yet, in the Response to Arguments section on page 36 of the rejection of March 31, 2008, the Examiner admits that the Applicant has defined an API in the specification. Furthermore, page 4 lines 12-19, page 5 line 19 to page 6 line 4, and page 17 lines 9-11 of Applicants' specification discloses an API. Therefore, the Applicants respectfully maintain that the API is defined.

In section 6 of the final rejection of 03/21/2008, the rejection asks how all these parts or "components" of the system function together. In the response to arguments section of the final rejection of 03/21/2008, the Examiner asserted that the claims are not clear and they do not show the interrelationship between the claimed components. In response, Claim 39 has been amended to clarify the interrelationship between various claimed elements. Support for Claims 39-45 can be found in Figures 4 and 5, and page 4 lines 12 to page 5 line 2, page 5 line 21 to page 6 line 9, and page 15 line 22 to page 20 line 17.

For the foregoing reasons, Applicants respectfully maintain that Claim 39 complies with the enablement requirement. Claims 40-45 depend from Claim 39 and comply with the enablement requirement for the same reasons as Claim 39.

The Rejection of Claims 1-9, 11 and 48 Under 35 USC § 102(e)

Claims 1-9, 11 and 48 are rejected under 35 USC § 102(e) as being anticipated by Hobbs (U.S. Pat. No. 6523022). Claims 1, 2, 3, 6, 7, 8, 9, 12 and 48 have been amended to more particularly point out the invention.

Applicants respectfully maintain that Hobbs does not teach each and every recitation of Claims 1 and 48. Claims 1 and 48 recite a first queue of a first workflow system and a second queue of a second workflow system. Hobbs merely teaches content in a content repository, and does not teach a queue of a workflow system.

Claim 1 recites: wherein the first workflow system, the second workflow system, the first content repository and the second content repository are distributed and disparate.

Although Hobbs teaches a data warehouse composed of databases having content, Hobbs does not teach first and second workflow systems. The rejection asserts that the data warehouse of Hobbs is linked to content within the data warehouse which is used to manage the multimedia content. However, Hobbs does not teach first and second workflow systems which are distributed and disparate from the data warehouse. The content which is used to manage the multimedia content is part of the data warehouse, and is not part of a workflow system that is distributed and disparate from the data warehouse.

A workflow system is different from a content repository. To construe the terms "workflow system" and "content repository" so broadly so that the data warehouse of Hobbs is both a workflow system and a content repository is contrary to the recitation of: wherein the first workflow system, the second workflow system, the first content repository and the second content repository are distributed and disparate.

For the foregoing reasons, Applicants respectfully maintain that Hobbs does not teach the first and second workflow systems of the claimed invention.

Applicants respectfully maintain that Hobbs does not teach a virtual folder organizing a seventh link being to the first folder, an eighth link being to the second folder, a third link being to the first queue, a fourth link being to a second queue, in which the first and second folders are of first and second content repositories, respectively, and the first and second queues are of first and second workflow systems, respectively. Hobbs merely teaches content of a database and not links to the folders containing the content in the database. In addition, Hobbs does not teach a link to a queue of a workflow system.

The rejection asserts that col. 1 lines 20-42 teaches a work organizing structure of the second workflow system in that links are linked to content within the data warehouse which is used to manage the multimedia content. However, the links and content within the data warehouse which is used to manage the multimedia content is not a queue. The rejection asserts that Hobbs teaches one of another queue and another task list in column 8 lines 18-34. In column 8 of Hobbs, line 26 refers to a list of index terms. The list of index terms of Hobbs is not a queue of a workflow system.

For the foregoing reasons, Applicants respectfully maintain that Claims 1 and 48 are not anticipated by Hobbs. Claims 2-9 and 11 depend from Claim 1 and are not anticipated for the same reasons as Claim 1.



The Rejection of Claims 24-27, 29-31 and 50 Under 35 USC § 102(e)

Claims 24-27, 29-31 and 50 are rejected under 35 USC § 102(e) as being anticipated by Hobbs (U.S. Pat. No. 6523022). Claims 24, 27 and 50 have been amended to more particularly point out the invention.

Applicants respectfully maintain that Hobbs does not teach each and every recitation of Claims 24 and 50. Claims 24 and 50 recite a first queue of a first workflow system and a second queue of a second workflow system. Hobbs merely teaches content in a content repository.

Claims 24 and 50 include a recitation of: wherein the plurality of content repositories and the plurality of workflow systems are distributed and dissimilar, the plurality of content repositories comprising a first content repository and a second content repository, the plurality of workflow systems comprising a first workflow system and a second workflow system; the first content repository, the second content repository, the first workflow system and the second workflow system being distributed and dissimilar.

Although Hobbs teaches a data warehouse composed of databases having content, Hobbs does not teach first and second workflow systems being distributed and dissimilar. The rejection asserts that the data warehouse of Hobbs is linked to content within the data warehouse which is used to manage the multimedia content. Hobbs does not teach first and second workflow systems which are distributed and dissimilar from the data warehouse. The content which is used to manage the multimedia content is part of the data warehouse, and is not part of a workflow system that is distributed and dissimilar from the data warehouse.

A workflow system is different from a content repository. To construe the terms "workflow system" and "content repository" so broadly so that the data warehouse of Hobbs is both a workflow system and a content repository is contrary to the recitation

of: the first content repository, the second content repository, the first workflow system and the second workflow system being distributed and dissimilar.

Therefore, Applicants respectfully maintain that Hobbs does not teach the first and second workflow systems of the claimed invention.

Hobbs merely teaches content of a database and does not teach nodes representing the folders containing the content in the database. In addition, Hobbs does not teach a node representing a queue of a workflow system.

The rejection asserts that col. 1 lines 20-42 of Hobbs teaches a work organizing structure of the second workflow system in that links are linked to content within the data warehouse which is used to manage the multimedia content. However, the links and content within the data warehouse which is used to manage the multimedia content is not a queue of a workflow system. The rejection asserts that Hobbs teaches one of another queue and another task list in column 8 lines 18-34. In column 8 of Hobbs, line 26 refers to a list of index terms. The list of index terms of Hobbs is not a queue of a workflow system.

For the foregoing reasons, Claims 24 and 50 are not anticipated by Hobbs. Claims 25-27, 29-31 and 50 depend from Claim 24 and are not anticipated for the same reasons as Claim 24.

#### The Rejection of Claims 12-13 Under 35 USC § 103(a)

Claims 12-13 are rejected under 35 USC § 103(a) as being obvious over Hobbs in view of Michaelides (U.S. Pub. No. 2004/0181753). In response Claims 13 has been amended to more particularly point out the invention.

Claims 12-13 depend from Claim 1. As discussed above, Hobbs does not teach all the recitations of Claim 1. Furthermore, Michaelides does not teach a virtual repository comprising at least one virtual folder organizing links. There is no teaching of a link to a folder in Michaelides. Furthermore, Michaelides does not teach first and second workflow systems. In addition, Michaelides does not teach a link to a work item and link to a queue of a workflow system.

Therefore, Applicants respectfully maintain that neither Hobbs nor Michaelides, alone or in combination, teach all the recitations of Claim 1, and therefore Claims 12-13. For the foregoing reasons, Applicants respectfully maintain that Claims 1, 12 and 13 are not obvious and are patentable.

#### The Rejection of Claims 32 and 58 Under 35 USC § 103(a)

Claims 32 and 58 are rejected under 35 USC § 103(a) as being obvious over Hobbs in view of Brunner (U.S. Pat. No. 5550971). In response Claim 32 has been amended to more particularly point out the invention.

Claim 32 depends from Claim 24. As discussed above, Hobbs does not teach all the recitations of Claim 24. Although Brunner uses the term "ASSOCIATION type", Brunner does not teach each and every recitation of Claim 32 of: wherein the associations have 0 or more association types, wherein the association types have logical properties describing the type of the relationship, wherein said logical properties comprise at least one of: an allowed cardinality of the relationship, allowed members of the relationship, required members of the relationship, a transitivity of the relationship, a delete propagation across the relationship, and a save propagation across the relationship.

Brunner is directed to a method and system for generating a user interface in a database management system. A semantic data model is used to describe a database

in terms of data types stored in the database and functional types that describe relationships between the data types stored in the database.

Brunner operates at the database level. In contrast, the claimed invention operates at a level that is higher than the database level. The claimed invention is directed to creating rich relationships between content, folders, work items and queues that exist in a plurality of content repositories, a plurality of workflow systems and at least one other external information source.

Therefore, Applicants respectfully maintain that neither Hobbs nor Brunner, alone or in combination, teach the recitations of Claims 24, and therefore Claims 32 and 58. For the foregoing reasons, Applicants respectfully maintain that Claims 24, 32 and 58 are not obvious and are patentable.

Claim 58 depends from Claim 24 and recites: wherein the associations have association types, wherein the association types have logical properties describing the type of the relationship, wherein said logical properties comprise an allowed cardinality of the relationship, allowed members of the relationship, required members of the relationship, a transitivity of the relationship, a delete propagation across the relationship, and a save propagation across the relationship.

Although Brunner uses the term "ASSOCIATION type", Brunner does not teach each and every recitation of Claim 58 of: wherein the associations have association types, wherein the association types have logical properties describing the type of the relationship, wherein said logical properties comprise an allowed cardinality of the relationship, allowed members of the relationship, required members of the relationship, a transitivity of the relationship, a delete propagation across the relationship, and a save propagation across the relationship. In particular, Brunner does not teach delete propagation or a save propagation across the relationship.

For the foregoing additional reasons, Applicants respectfully maintain that Claim 58 is not obvious and is patentable.

The Rejection of Claims 39-44 and 52-57 Under 35 USC § 103(a)

Claims 39-44 and 52-57 are rejected under 35 USC § 103(a) as being obvious over Hobbs in view of Armstrong (U.S. Pat. No. 6279046). Claims 39, 41-43, 45, 52, 55, 56 and 57 have been amended to more particularly point out the invention.

Applicants respectfully maintain that neither Hobbs nor Armstrong teach, alone or in combination, all the recitations of Claims 39 and 57.

As discussed above, Hobbs does not teach a workflow system or first and second workflow systems. As discussed above, Hobbs does not teach that the first content repository, the second content repository, the first workflow system and the second workflow system are disparate and distributed. Hobbs is directed to content and not workflow. Hobbs does not teach the first queue and the second queue of Claims 39 and 57.

Armstrong does not teach first and second workflow systems. Armstrong does not teach a work item of a workflow system. Armstrong also does not teach a queue of a workflow system.

In addition, Armstrong does not disclose the subscriptions of the claimed invention. Armstrong is directed to event-driven communication within a single physical computer system. Armstrong teaches events between logical partitions in a single computer system. Armstrong does not teach events based on changes in the content and folders of content repositories and work items and queues of workflow systems.

Furthermore Armstrong does not teach a filter that filters interesting and uninteresting changes in events based on changes in content repositories and workflow system.

Armstrong does not teach: an event path defined per a logical group comprising a timer, a subscription group processor that creates events based on the plurality of subscriptions in response to the timer, a content monitor that detects change in the first content, first folder, second content, second folder, first work item, first queue, second work item, and second queue based on the events, an event filter that filters uninteresting change and interesting change based on the change detected by the content monitor, and an event handler that receives the interesting change, wherein the event handler logs the interesting change.

Thus, the combination of Hobbs and Armstrong does not teach all the recitations of Claims 39 and 57, and Claims 39 and 57 are patentable.

Furthermore, Armstrong is directed to an event-driven communications interface to support communications between multiple logical partitions in a logically-partitioned computer. With logical partitioning, a single physical computer is permitted to operate essentially like multiple and independent "virtual" computers (referred to as logical partitions), with the various resources of the physical computer. Each logical partition executes a separate operating system. A shared resource, often referred to as a "hypervisor" or partition manager, manages the logical partitions and facilitates the allocation of resources to different logical partitions. Passage of events between logical partitions typically occurs completely through the internal hardware components of the computer, and usually with relatively little overhead, thereby providing performance that is superior to the use of external networks.

Therefore Armstrong is directed to a different problem from Claims 39 and 57, and one skilled in the art would not look to Armstrong to provide notification of event handlers based on change to content and folders of content repositories, and based on change to work items and queues of workflow systems.

For the foregoing reasons, Applicants respectfully maintain that Claims 39 and 57 are not obvious and are patentable. Claims 40-44 and 52-56 depend from Claim 39 and are patentable for the same reasons as Claim 39.

The Rejection of Claim 45 Under 35 USC § 103(a)

Claim 45 is rejected under 35 USC § 103(a) as being obvious over Hobbs in view of Armstrong (U.S. Pat. No. 6279046) in view of Zintel (U.S. PG. Pub. No. 2002/0029256) further in view of Mobley (U.S. Pat. No. 5708963). Claim 45 has been amended to more particularly point out the invention.

Claim 45 depends from Claim 39. As discussed above, neither Hobbs nor Armstrong teaches, alone or in combination, each and every recitation of Claim 39. Furthermore the combination of Hobbs, Armstrong, Zintel and Mobley does not teach all the recitations of Claims 39, and therefore Claim 45.

Neither Zintel nor Mobley teach first and second workflow systems or a work item and a queue of a workflow system. Neither Zintel nor Mobley teach: wherein the first content repository, the second content repository, the first workflow system and the second workflow system are disparate and distributed.

One skilled in the art would not look to Mobley or Zintel to solve the problem of the claimed invention. Mobley is directed to an apparatus for using a low earth orbit satellite for reverse path communication in a subscription information service

delivery system. Zintel publication is directed to a universal plug and play device. One skilled in the art would not look to Mobley or Zintel to provide subscriptions to content and content organizing structures in content repositories and to work items and work organizing structures in workflow systems.

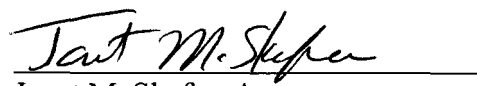
For the foregoing reasons, Applicants respectfully maintain that Claim 45 is not obvious and is patentable.

Conclusion

Consequently, the Applicants believe that all these claims are presently in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issue are earnestly solicited.

Respectfully submitted,

June 20, 2008



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